

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

NATIONAL SALVAGE & SERVICE
CORPORATION,

Plaintiff,

v.

SULA VALLEY BIOGAS, SA DE
C.V., and HONDURAN GREEN
POWER CORPORATION,

Defendants.

C.A. No. 22-1428-TMH

AFFIDAVIT OF ATTORNEYS' FEES AND EXPENSES

I, Adam D. Zacher, being first duly sworn upon my oath, depose and state that I am an adult over 18 years of age, have personal knowledge of and am competent to testify to the following facts:

1. I am an attorney licensed to practice law in the State of Indiana, and my firm, Taft Stettinius & Hollister LLP ("Taft"), has been engaged to represent the Plaintiff, National Salvage & Service Corporation ("NSSC" or "Seller") in this action.

2. Riddhi Dasgupta and I have been admitted by this court to represent NSSC in this matter *pro hac vice*.

3. I have been practicing law for approximately 6.5 years, and I concentrate my practice on commercial litigation matters.

4. NSSC has incurred legal fees and costs from Taft in the amount of \$39,508.40 in issuing its demands to Defendants, Sula Valley Biogas, SA DE C.V. ("Sula Valley") and Honduran Green Power Corporation ("HGPC" and together with Sula Valley, the "Buyer"); preparing its Complaint; obtaining a default, and filing its Application for Default Judgment.

5. The breakdown of fees and costs provided by Taft are as follows:

TIMEKEEPER	HOURS	FEES
Riddhi Dasgupta	26	\$17,550.00
Adam D. Zacher	49.2	\$20,842.50
Jennifer Burgess	1.7	\$431.00
Denine Del Balso	1.0	\$255.00

6. In total, Taft has provided 78.9 hours of legal services to date, including but not limited to activities such as:

- a. Drafting the complaint;
- b. Researching and working on application for default; and
- c. Working on the Application for Default Judgment.

7. Based on the factors set forth in Rule 1.5 of the Delaware Lawyers' Rules of Professional conduct, it is my opinion that \$39,508.40 is a reasonable award of attorneys' fees incurred for the work that Taft has performed in pursuing NSSC's claims against the Buyer.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 2/24/2023


Adam D. Zacher